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ESTICIDES & TOXIC SUBSTANCE
BRANCH — EPA REGION 10

TSCA Report

Facility

S.J. Nudelman and Son
2707 N.W. Nela Street
Portland, OR 97210

Site Address

Same

Phone: (503) 226-4051

Inspection Date and Time

June 13, 1994 11:15 AM

Inspectors

Dan Heister, Environmental Protection Specialist
Environmental Protection Agency, Oregon Operations Office

Bruce Long, Environmental Protection Specialist
Environmental Protection Agency, Oregon Operations Office

Contacts

Sanford J. Nudelman, Owner/Manager

Report Written by: Dan Heister *Dan Heister*

Inspection Authority and Purpose

Authority for conducting the inspection was cited by referencing Section 11 of the Toxic Substances Control Act (TSCA). This inspection was intended to secure information regarding the facility's compliance with applicable regulations under 40 C.F.R. §761.

Background (Previous TSCA)

This was the second time this facility had been inspected for compliance with TSCA/PCB regulations. Ron Culver of USEPA/000 conducted the first inspection on 8/4/88 and the facility was sighted for six violations of 40 CFR 761 on 9/27/94. This inspection resulted from a call to me on 7/11/94 from Oregon OSHA alerting me that there had been a small fire at S.J. Nudelman & Son (SJNS). The OSHA Inspector who investigated the fire said he had seen some small electrical equipment in the fire area and some larger equipment else where on the site. The inspector thought some of the equipment may contain PCB. Being unfamiliar with the site and concerned that there had been a fire I asked Bruce Long of the 000 to accompany me as a back up on the inspection and he agreed to do so.

Introduction

Mr. Long and I arrived at the SJNS property at approximately 11:00 AM on 6/13/94. The property is approximately two and one

half acres and has a mobile home which serves as the office. We entered the property from the south side. The most distinguishing feature of the property is it is almost completely over run by wild blackberries (Photo #1). Photos #2-#6 show the south end of the property line. Long and I immediately noticed debris along a railroad spur which appeared to have been bulldozed down from the SJNS property line (see photos #2- #6). The debris contained fluorescent light ballasts, small electric capacitors and one medium sized bushing. Long and I looked at the debris more closely and we found that the small capacitors in the debris were marked non-PCB. Other small caps and ballasts were in too poor a condition to identify.

We continued up the driveway to the property and found the office. There we located Mr. Sanford J. Nudelman and we presented our credentials to him. I then explained the reason we were there and the scope of the inspection. The NOI (Attachment 1), Confidentiality Notice (Attachment 2) and TSCA Receipt for samples were presented and all were signed by Mr. Nudelman at the appropriate time.

I told Mr. Nudelman that OROSHA had informed me about the fire and the possible involvement of electric equipment. I asked if he was salvaging transformers on the premises. He said he had salvaged electrical transformers in the past, before Ron Culver's inspection, but he had ceased doing it. I asked if there were any transformers or large capacitors presently on site and he said he wasn't sure. He said he just scrapped wire from obsolete telephone equipment and lighting fixtures and was not aware that any PCB was involved. I asked if we could tour the property and he said that would be fine.

Site Tour

Mr. Long and I toured the entire yard but because of Mr. Nudelman's age (76 years old) he requested that his involvement be limited. I said that would be fine. I asked Mr. Nudelman to take us to the site of the fire. He took us directly behind the office to the area seen in Photo #7. Mr. Nudelman said that one of his workers was using a power grinder to cut up metal when some of the sparks ignited the pile seen directly behind Bruce Long in Photo #7. He said that the fire department responded quickly and the fire was out in a matter of minutes, but due to regulation OROSHA was called to investigate. Photo #7 also shows a fence, beyond which was the largest part of the yard. This area held the majority of scrap on the property but was made very inaccessible by blackberry bramble. Mr. Nudelman said we were welcome to examine that area but he would not be able to accompany us. He said that if we didn't need anything else from him he would wait for us in his office. I said that would be permissible.

Photos #8-#17 show the variety of equipment we saw in the fire area. As Mr. Nudelman said the fire didn't appear to be that

extensive and mostly involved dead blackberry branches and some insulation off of wiring. What was bothersome however was the precarious way things were piled not only in the burned area but throughout the property. As photo #8 shows footing could be quite hazardous and made it difficult to view and inventory the equipment. Mostly what we observed were assumed to be PCB light ballasts like those seen in photos #9-#11 and small scale capacitors like those in photos #12-#14.

We did find a larger piece of equipment in the fire area which was covered by a considerable amount of debris. This unit can be seen in photos #15-#17. The unit was a Westinghouse Potential Transformer Type PTO, style # 1304070-A, Serial #90004. The name plate had no indication of what type dielectric it contained and did not appear to be leaking. The dimensions of the unit appeared to be 12" by 12" by 12".

We next proceeded to the area located directly behind the fence adjacent to the fire area. This area was literally smothered in blackberry bushes and by the end of the tour both my and Bruce Long's Tyvek coveralls were in shreds. This area can best be seen in photo #7 which shows a huge pile of scrap behind the barbed wire topped fence. Atop this pile was the Westinghouse single phase S-Transformer (Serial #72U172) seen in photo #18. The name plate did not indicate the type of dielectric. In retrospect, I took considerable risk to reach this transformer, which was about 20 feet high atop a huge pile of scrap. After having done it once I would not have attempted it again. As best we could tell this was the only visible transformer on the entire pile. Photo #19 shows the pile from the reverse angle of photo #7

Long and I next proceeded in an easterly direction back into the fenced area. At times it required us to crawl through small tunnels in the bramble. We next came upon the unit pictured in photo #20. This unit was a Westinghouse 30 KVA, 3 phase, type ERT transformer the name plate was badly rusted (seen photo #21) and I could not obtain a serial number. No dielectric type was indicated.

We pressed on and came across the nine large bushings seen in Photo #22. They appeared to be large transmission type bushings however we were unable to locate any name plates on them. Just to the right of these bushings we found a pile of submersible pumps used for domestic wells. The units were similar to those involved in the Valley Pump and Equipment case conducted in 1991 in Klamath Falls, OR. Photo #23 shows this pile of approximately twenty units and Photo #24 is a close up of one of the units. This unit was also the source of the wipe sample #94244565.

After examining the pumps I went due south and discovered two extremely rusted transformer cans. They were empty and without tops and in very bad condition. I was unable to find a nameplate and unable to get photographs because our camera had become wet

and quit operating. The cans were on their sides and appeared to be old polemounts in the 30 to 50 KVA range. they had clearly been there for at least ten years as soil and debris had begun to fill them up. Sample # 94244566 is a sample of this soil material. Sample # 94244567 is a sample of some foam insulation from the inside of one of these units.

Long and I then made our way back to the fire area and collected two samples of potting compound from ruptured light ballasts these are Samples # 94244568 and # 94244569. We secured the samples in the trunk of our car and proceeded to close the inspection with Mr. Nudelman.

Closing Conference

We returned to Mr. Nudelman's office and we conducted the Closing Conference. I said I would be forwarding a report to our Seattle Office for review and that the sample analysis if positive for even low levels of PCB might constitute a possible violation. I noted that many of the small capacitors and light ballasts could contain high level PCB. I asked Mr. Nudelman about the larger equipment we had found and he said that it had been on site well before Ron Culver's inspection in 1988 and that Culver had seen much of it. He said that most of the equipment had come off of ships that had been scrapped at the Portland shipyard, but the majority of his scrap had come from the telephone company (Western Electric). He expressed some frustration in that ODEQ had done a complete inspection of the site after Ron Culver had been there and had found him in compliance. After the ODEQ inspection he didn't believe he had any regulated equipment on site. I asked if he had any sample result associated with the larger equipment and he said no. We concluded the inspection at 1:30 pm.

Attachments


1. TSCA- Notice of Inspection
2. TSCA- Inspection Confidentiality Notice
3. TSCA- Receipt for Samples (Forthcoming)
4. Sample results

S.J. Nudelman,
Portland,OR,HEISTER
6/13/94 PHOTO #1



S. J. NUDELMAN & SON

• DEALERS IN •
SCRAP IRON & METALS

 **OFFICE & SCALES**

S.J. Nudelman,
Portland,OR, HEISTER,
6/13/94 PHOTO #2



S.J. Nudelman,
Portland,OR,HEISTER
6/13/94 PHOTO #3



S.J. Nudelman,
Portland,OR,HEISTER
6/13/94 PHOTO #4



S.J. Nudelman,
Portland,OR, HEISTER,
6/13/94 PHOTO #5



S.J. Nudelman,
Portland,OR,HEISTER
6/13/94 PHOTO #6



S.J. Nudelman,
Portland,OR,HEISTER
6/13/94 PHOTO #7



S.J. Nudelman,
Portland,OR, HEISTER,
6/13/94 PHOTO #8



S.J. Nudelman,
Portland,OR,HEISTER
6/13/94 PHOTO #9



S.J. Nudelman,
Portland,OR,HEISTER
6/13/94 PHOTO #10



S.J. Nudelman,
Portland,OR, HEISTER,
6/13/94 PHOTO #11



S.J. Nudelman,
Portland,OR,HEISTER
6/13/94 PHOTO #12



S.J. Nudelman,
Portland,OR,HEISTER
6/13/94 PHOTO #13



S.J. Nudelman,
Portland,OR, HEISTER,
6/13/94 PHOTO #14



S.J. Nudelman,
Portland,OR,HEISTER
6/13/94 PHOTO #15



S.J. Nudelman,
Portland,OR,HEISTER
6/13/94 PHOTO #16



S.J. Nudelman,
Portland,OR, HEISTER,
6/13/94 PHOTO #17

UNITED STATES ARMY SERIAL NO. 100000	WESTINGHOUSE POTENTIAL TRANSFORMER TYPE PTD	FIELD NUMBER ACCIDENT DATE LOCATION REMARKS	FIELD NUMBER DATE LOCATION REMARKS
100000	100000	100000	100000

WESTINGHOUSE ELECTRIC & MANUFACTURING CO. PITTSBURGH, PA. U.S.A.

S.J. Nudelman,
Portland,OR,HEISTER
6/13/94 PHOTO #18



S.J. Nudelman,
Portland,OR,HEISTER
6/13/94 PHOTO #19

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S.J. Nudelman,
Portland,OR, HEISTER,
6/13/94 PHOTO #20



S.J. Nudelman,
Portland,OR,HEISTER
6/13/94 PHOTO #21



S.J. Nudelman,
Portland,OR,HEISTER
6/13/94 PHOTO #22

11 21 94 - 22



S.J. Nudelman,
Portland,OR, HEISTER,
6/13/94 PHOTO #23

11 21 44 142



S.J. Nudelman,
Portland,OR,HEISTER
6/13/94 PHOTO #24

